

Hearing Date: October 23, 2019 at 10:00 am
Objection Deadline: October 16, 2019 at 4:00 p.m.

ALSTON & BIRD LLP

Leib M. Lerner (*Admitted Pro Hac Vice*)

333 South Hope Street, 16th Floor

Los Angeles, CA 90071

Telephone: (213) 576-1000

Facsimile: (213) 576-1100

Email: leib.lerner@alston.com

-and-

James J. Vincequerra

90 Park Avenue

New York, NY 10016-1387

Telephone: (212) 210-9400

Facsimile: (212) 210-9444

Email: James.Vincequerra@alston.com

*Attorneys for Twentieth Century Fox Home
Entertainment LLC*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
	:	
In re:	:	Chapter 11
	:	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	Case No. 18-23538 (RDD)
	:	
Debtors. ¹	:	(Jointly Administered)
-----X	:	

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

**JOINDER OF TWENTIETH CENTURY FOX HOME ENTERTAINMENT LLC TO
TO THE MOTION OF MIEN CO. LTD., HELEN ANDREWS, STRONG PROGRESS
GARMENT FACTORY COMPANY, LTD, SAMIL SOLUTIONS SHANGHAI
FOCHIER, PURCELL MURRAY, A&A HK INDUSTRIAL, MINGLE FASHION,
MANSHEEN INDUSTRIES, LTD. AND AMW VIETNAM CO. LTD. FOR ENTRY OF
AN ORDER PURSUANT TO 11 U.S.C. § 1112(b) EITHER DISMISSING THE CASE OR
CONVERTING THE CASE TO A CHAPTER 7 LIQUIDATION**

**TO: THE HONORABLE ROBERT D. DRAIN,
UNITED STATES BANKRUPTCY JUDGE:**

Twentieth Century Fox Home Entertainment LLC, (“**Fox**”), by and through its counsel, Alston & Bird LLP, files this Joinder to the Motion of Mien Co. Ltd., Helen Andrews, Strong Progress Garment Factory Company, Ltd, Samil Solutions Shanghai Fochier, Purcell Murray, A&A HK Industrial, Mingle Fashion, Mansheen Industries, Ltd. and AMW Vietnam Co. Ltd. for Entry of an Order Pursuant to 11 U.S.C. § 1112(b) Either Dismissing the Case or Converting the Case to a Chapter 7 Liquidation [Doc. 5161] (the “**Conversion Motion**”), to the extent that the Conversion Motion seeks to convert the Debtor’s case to Chapter 7.

Dated: New York, New York
October 2, 2019

Respectfully submitted,

/s/ James J. Vincequerra
James J. Vincequerra
ALSTON & BIRD LLP
90 Park Avenue
New York, New York 10016
Tel: 212-210-9400
Fax: 212-210-9444
Email: James.Vincequerra@alston.com

- and -

Leib M. Lerner (*Admitted Pro Hac Vice*)
333 South Hope Street, 16th Floor
Los Angeles, CA 90071
Telephone: (213) 576-1000
Facsimile: (213) 576-1100
Email: Leib.Lerner@alston.com

*Attorneys for Twentieth Century Fox Home
Entertainment LLC*